

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

S.B.,

Plaintiff,

vs.

No. 13-CV-1120 MV/KBM

STATE OF NEW MEXICO,
NEW MEXICO DEPARTMENT OF PUBLIC SAFETY,
DR. JOHN DOE, and TIMOTHY CARLSON,

Defendants,

and

NEW MEXICO DEPARTMENT OF PUBLIC SAFETY,

Cross-Claimant,

vs.

TIMOTHY CARLSON,

Crossclaim-Defendant.

OFFER OF JUDGMENT

COME NOW Defendants Timothy Carlson, State of New Mexico and New Mexico Department of Public Safety, by undersigned counsel, pursuant to Fed.R.Civ.P. 68, and hereby offer to allow judgment to be taken against them in this action, jointly and severally, in the amount of \$200,000.00, plus an additional amount representing costs and attorney's fees accrued to date, the latter amount to be determined by the Court in accordance with D.N.M.LR-Civ. 54.5.

This Offer of Judgment is being made pursuant to Rule 68 and shall not be deemed to constitute an admission of liability.

Respectfully submitted,

/s/ Michael Dickman
MICHAEL DICKMAN
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Santa Fe, NM 87504
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Attorney for Defendants
State of New Mexico and
Department of Public Safety

/s/ James P. Sullivan
JAMES P. SULLIVAN
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Attorney for Defendant
Timothy Carlson

CERTIFICATE OF SERVICE

I certify that I emailed this Offer of Judgment to

Joseph P. Kennedy, Esq.
Shannon L. Kennedy, Esq.
Theresa V. Haksi, Esq.

and

also mailed a true and correct copy to Mr. Kennedy
by U.S. mail, postage prepaid to

Joseph P. Kennedy, Esq.
Kennedy, Kennedy & Ives LLC
1000 Second Street NW
Albuquerque, NM 87102

on June 26, 2014

/s/ Michael Dickman
MICHAEL DICKMAN